

**WACHTELL, LIPTON, ROSEN & KATZ**

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*Attorneys for Metropolitan Commercial Bank*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	:
<b>VOYAGER DIGITAL HOLDINGS, INC., et al.,</b>	: <b>Chapter 11</b>
<b>Debtors.<sup>1</sup></b>	: <b>Case No. 22-10943 (MEW)</b>
	: <b>(Jointly Administered)</b>
	:
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**NOTICE OF APPEARANCE AND  
REQUEST FOR NOTICES AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Wachtell, Lipton, Rosen & Katz hereby appears as counsel for Metropolitan Commercial Bank in the above-captioned cases. Pursuant to Rules 2002, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure and Section 1109(b) of the United States Bankruptcy Code, Metropolitan Commercial Bank requests that all notices given or required to be given in connection with the above-captioned cases, and all papers served or required to be served in connection therewith, be given and served upon:

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (N/A); and Voyager Digital, LLC (8013). The location of the Debtors' principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, any and all notices in respect of any application, motion, petition, pleading, request, complaint, demand, order or any other paper filed in the within the above-captioned cases whether such notice is formal or informal, written or oral, and whether transmitted by hand delivery, United States Mail, electronic mail, expedited delivery service, telephone, facsimile, or otherwise.

This notice of appearance and request for notice and service of papers is not, and may not be deemed or construed to be, a waiver of any of Metropolitan Commercial Bank's substantive or procedural rights, including without limitation: (i) Metropolitan Commercial Bank's right to have final orders in non-core matters entered only after de novo review by a District Court; (ii) Metropolitan Commercial Bank's right to trial by jury in any proceeding so triable herein or in any case, controversy, or proceeding related hereto; (iii) Metropolitan Commercial Bank's right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; (iv) Metropolitan Commercial Bank's right to have any claims constitutionally required to be determined by the District Court be determined therein; (v) Metropolitan Commercial Bank's right to have any matter heard by an arbitrator or other adjudicatory or alternative dispute resolution authority, foreign or domestic; or (vi) any other rights, claims, actions, defenses, set-offs, or recoupments to which Metropolitan Commercial Bank

is or may be entitled in law or in equity under the laws of the United States of America, any other applicable sovereignty, or any subdivision of any of the foregoing, or under any agreement, including without limitation any defense of a lack of jurisdiction over the person, improper venue, or *forum non conveniens*, all of which Metropolitan Commercial Bank expressly reserves.

Dated: New York, New York  
July 12, 2022

WACHTELL, LIPTON, ROSEN & KATZ

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